

2. I received a Bachelor of Science degree in 1980 in Plant Science from The Pennsylvania State University and I received the Ph.D. from Cornell University in 1984. Immediately upon receiving my doctorate, I held the position of Molecular Biologist, Department

of Virological Testing at Lederle Laboratories Division of American Cyanamid Company, working on poliovirus and herpes simplex virus. Since my time as an undergraduate student in 1978, I have been studying and teaching undergraduate, graduate and medical students about viruses in the classroom and laboratory. I bring over forty years of expertise to this case based on my knowledge, skill, education, training and experience. A copy of my *curriculum vitae* is Annexed as **Exhibit “A”**.

3. I am a member of the American Society for Microbiology, the American Society for Virology, the Pan American Society for Clinical Virology, and the International Association of Medical Science Educators.

4. On or about April 14, 2020 I was retained by Plaintiffs ABBEY HOTEL ACQUISITION, LLC, SETAI HOTEL ACQUISITION, LLC, SETAI RESORT AND RESIDENCE CONDOMINIUM ASSOCIATION, INC. and SETAI VALET SERVICES, LLC to offer my expert opinion as to the characteristics of SARS-CoV-2 and its ability to cause physical loss or damage.

5. Attached hereto as **Exhibit “B”** is a true and accurate copy of the expert report which I authored.

6. The above referenced report accurately reflects by opinions in this matter and the opinions contained therein are based upon a reasonable degree of scientific certainty.

7. The statements made below in ¶¶ 8-9 also reflect my opinions in this matter and these opinions are based upon a reasonable degree of scientific certainty after my examination of the calculations as set forth in the report of Dr. Aleksandr Aravkin regarding the presence of SARS-CoV-2 in Miami-Dade County, as well as documents that pertain to this specific case, and scientific manuscripts that establish the properties of SARS-CoV-2, the nature of the virus' spread,

its unusual infectiousness, and its unusual propensity to retain its infectivity *in vitro*.

8. It is my expert opinion that a virus is a communicable disease. It is also my expert opinion that the approximately 2.9 of every 1000 persons who visited Plaintiff Properties on March 26, 2020 were infectious and shedding SARS-CoV-2, and furthermore, were unlikely to be wearing facemasks, especially during spring break. This SARS-CoV-2 contamination at Plaintiff Properties caused physical loss or damage. All my opinions are held to a reasonable degree of scientific certainty.

9. It is also my opinion, with a reasonable degree of scientific certainty that SARS CoV-2 virus physically contaminated the physical surfaces and air supplies of commercial businesses' countertops, rooms, cash register, credit card machines, restaurants and the air itself. The presence of SARS-CoV-2 caused physical loss or damage to theses premises, surfaces and air supply, leading to the closure of the commercial tenants' businesses at the client's commercial space by governmental order.

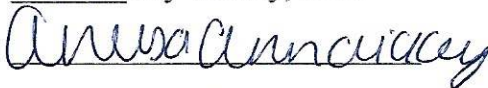
I declare under penalty of perjury under the laws of the Commonwealth of Pennsylvania and the United States of America that the foregoing is true and correct.



Dr. Michael A. Sulzinski

Sworn to before me this

19 day of <sup>July</sup>~~May~~, 2021



Notary Public

